

# **AMTRAK Wilmington Yards**

## **DNREC's and EPA's Expectations**



Wilmer Reyes

DE DNREC Site Investigation and Restoration Section

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# DNREC's and EPA's Expectations

- Move the site into the cleanup process, from RI/FFS to RD/RA
- Ensure that proposed remedies comply with HSCA, TSCA and other ARARs (e.g., DRBC PMP, EPA TMDL, and DNREC SWQS)
- More complete control of upland sources
- Substantial and aggressive remediation of PCB and petroleum in the EDD

# Move the Site into RD/RA

- Expectations:
  - DNREC will approve data collected during Phase II RI and portions of the FFS
  - AMTRAK will need to revise proposed remedial alternatives for the upland soils & EDD sediments
- Rationale:
  - Sufficient data exists to characterize on-site and off-site risks
  - DNREC & EPA do not concur with AMTRAK's interpretation of the RI data
  - DNREC & EPA believe additional remediation is necessary beyond that proposed in the FFS

# Ensure Compliance with HSCA, TSCA and other ARARs

- Expectation:

Amtrak must submit a Hybrid Clean Up Plan in compliance with the TSCA regulations

- Upland soils: 40 C.F.R. Part 761.61(a). Self Implementing Remedy
- Sediments and bank soils: 40 C.F.R. Part 761.61(c). Risk-based Remedy

# Ensure Compliance with HSCA, TSCA and other ARARs

- Expectation for Upland Soils:
  - Removal and off-site disposal of upland soils with PCB concentrations above 10 ppm, in compliance with TSCA 40 C.F.R. Part 761.61(a) Self-implementing, High Occupancy definition
  - Cap all remaining upland soils with PCB concentrations between 1 and 10 ppm
  - Alternative to the cap option, removal and off-site disposal of upland soils with PCB concentrations above 1 ppm without further conditions
  - Install recovery trenches for NAPL/PCB

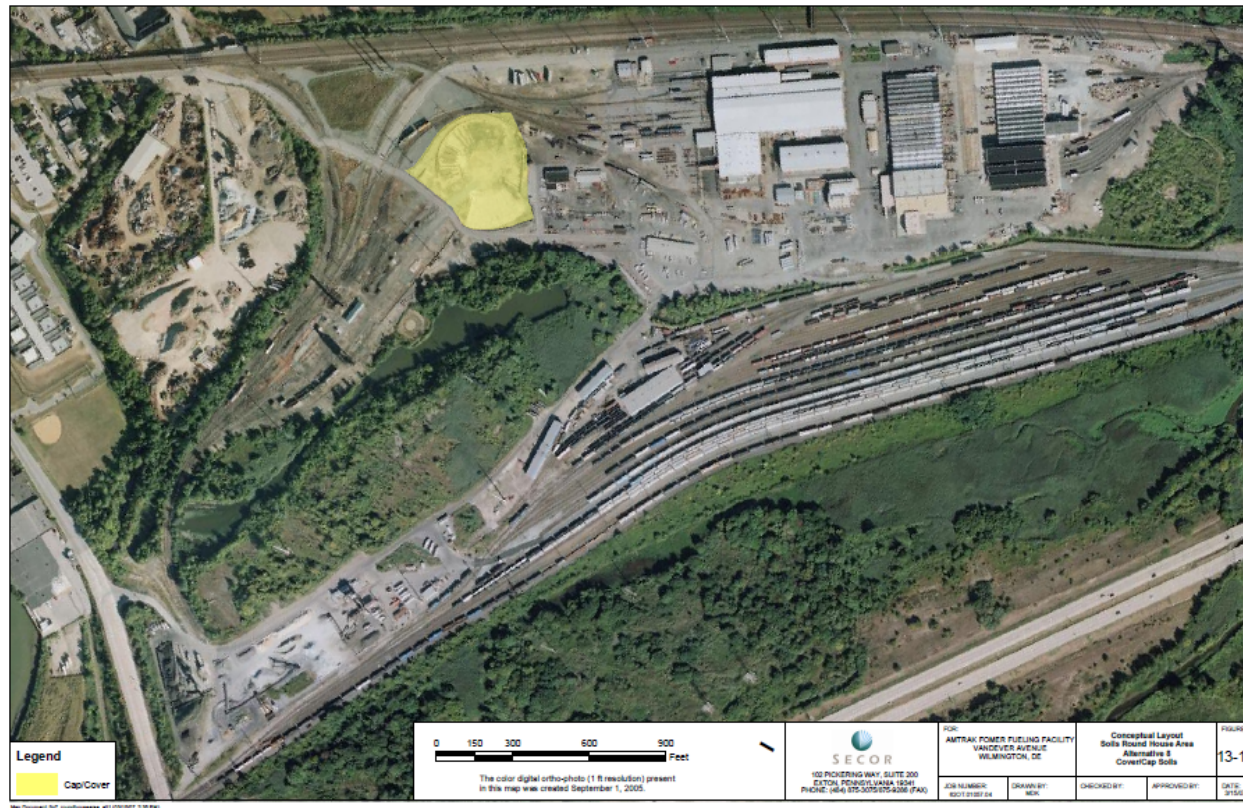
# Ensure Compliance with HSCA, TSCA and other ARARs

- Expectation for Sediment and Bank Soils:
  - Removal and off-site disposal of all sediments and bank soils from the EDD with PCB concentrations above a risk based cleanup standard of 1 ppm (essentially all sediments to the clay layer)
  - Implement pilot of stabilization and capping proposal for WDD and Ditch East of EDD to demonstrate effectiveness.

# Ensure Compliance with HSCA, TSCA and other ARARs

- Rationale:
  - HSCA and EPA TSCA remediation standards apply to on-site and off-site receptors. DRBC PMP rule applies on and off-site. EPA TMDL & DNREC SWQS apply off-site
  - Capping of upland soils with PCB levels between 1 and 10 ppm will prevent future ecological impact in EDD and avoid future off-site exceedances of SWQC in the Brandywine
  - 1 ppm PCB risk based clean up level for sediments is protective of ecological and wildlife receptors and human health, based upon DNREC's PCB assessments
  - A 1 ppm site cleanup level for sediments and bank soils is consistent with the intent of the DRBC PMP rule and with cleanups established for other PCB contaminated sites through the US

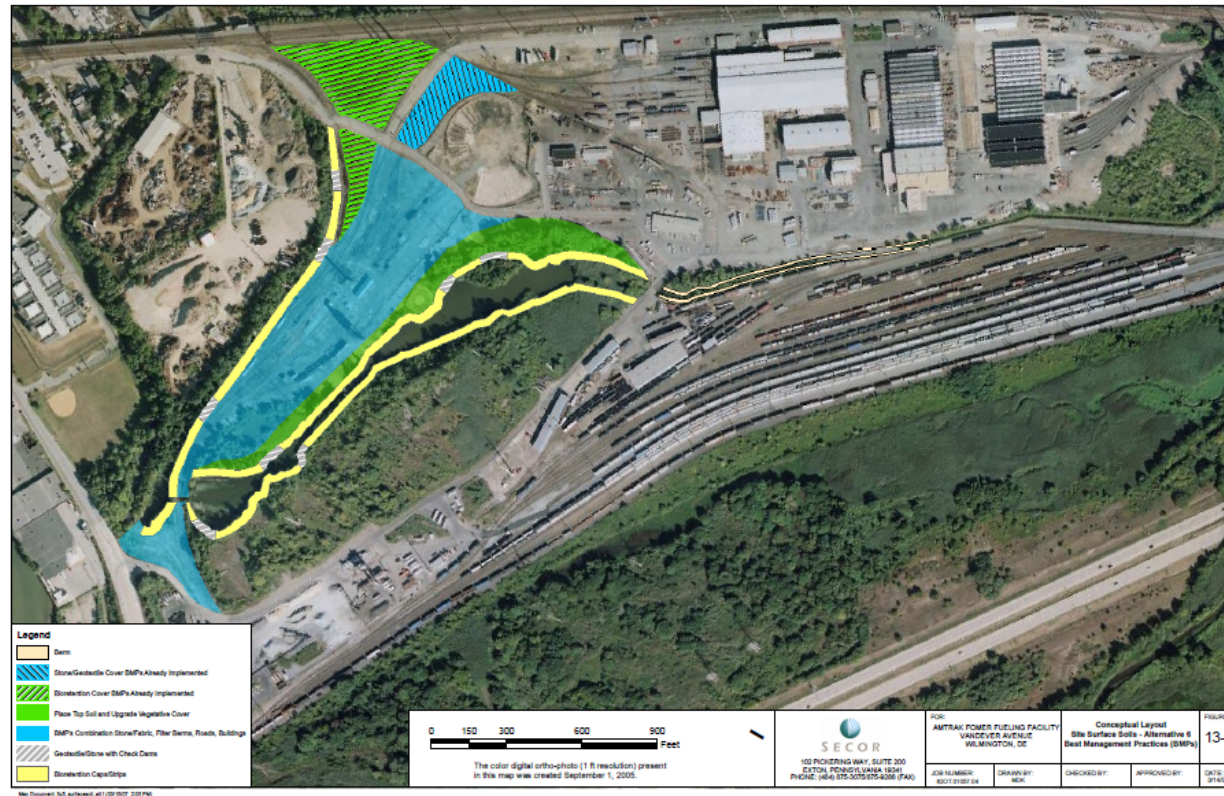
# Control Upland Sources: Roundhouse



Expectation: Removal and off-site disposal of upland soil with PCB concentrations above 10 ppm. Cap remaining soils with PCBs between 1 and 10 ppm.

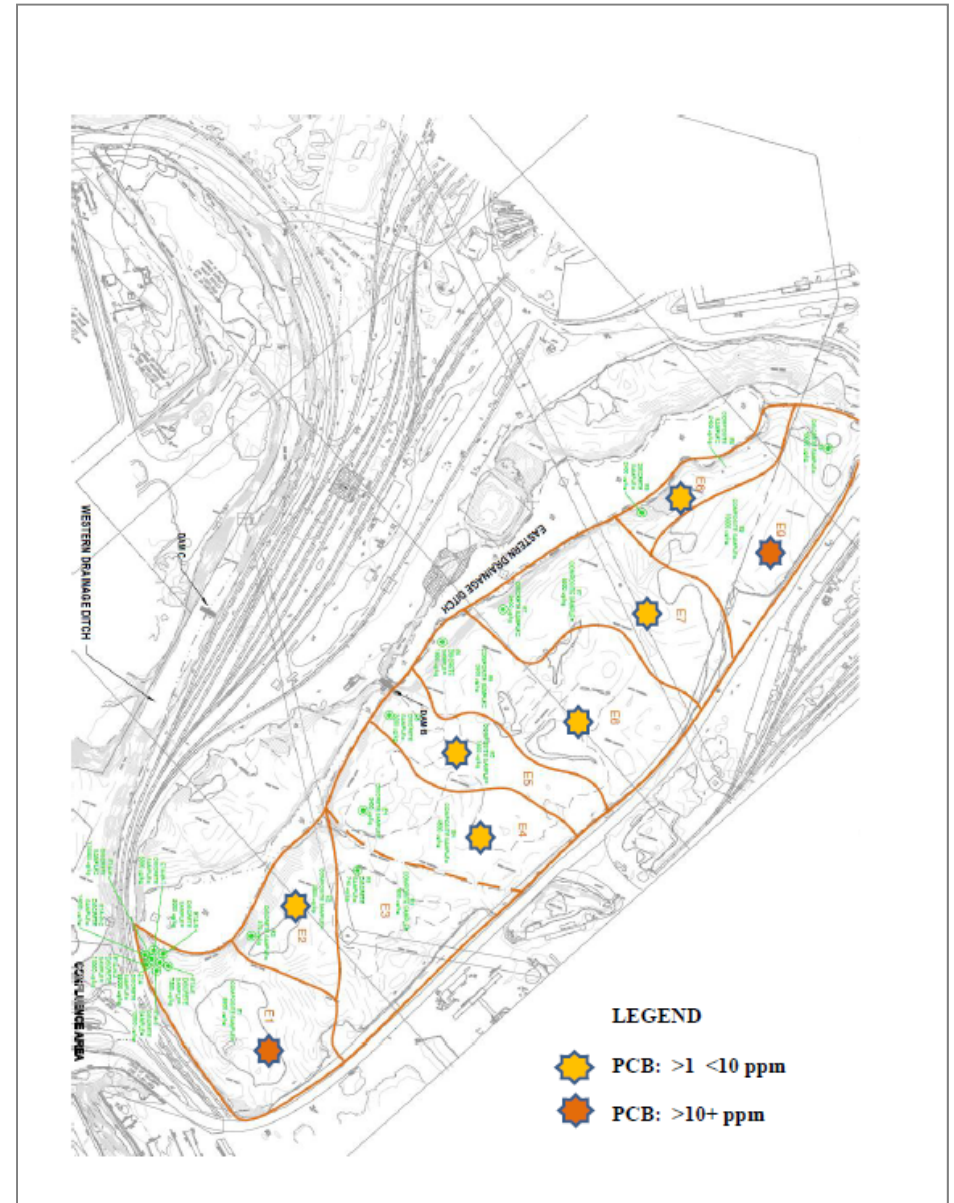
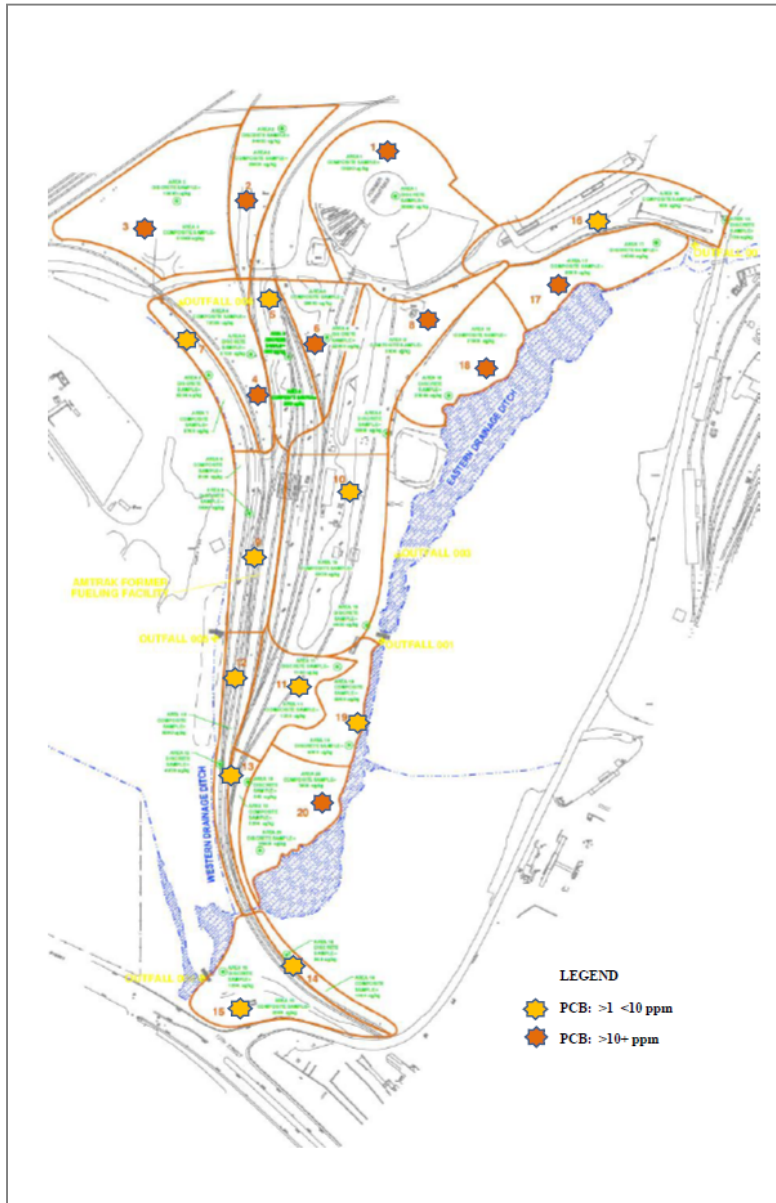


# Control Upland Sources: Site-Wide Soils



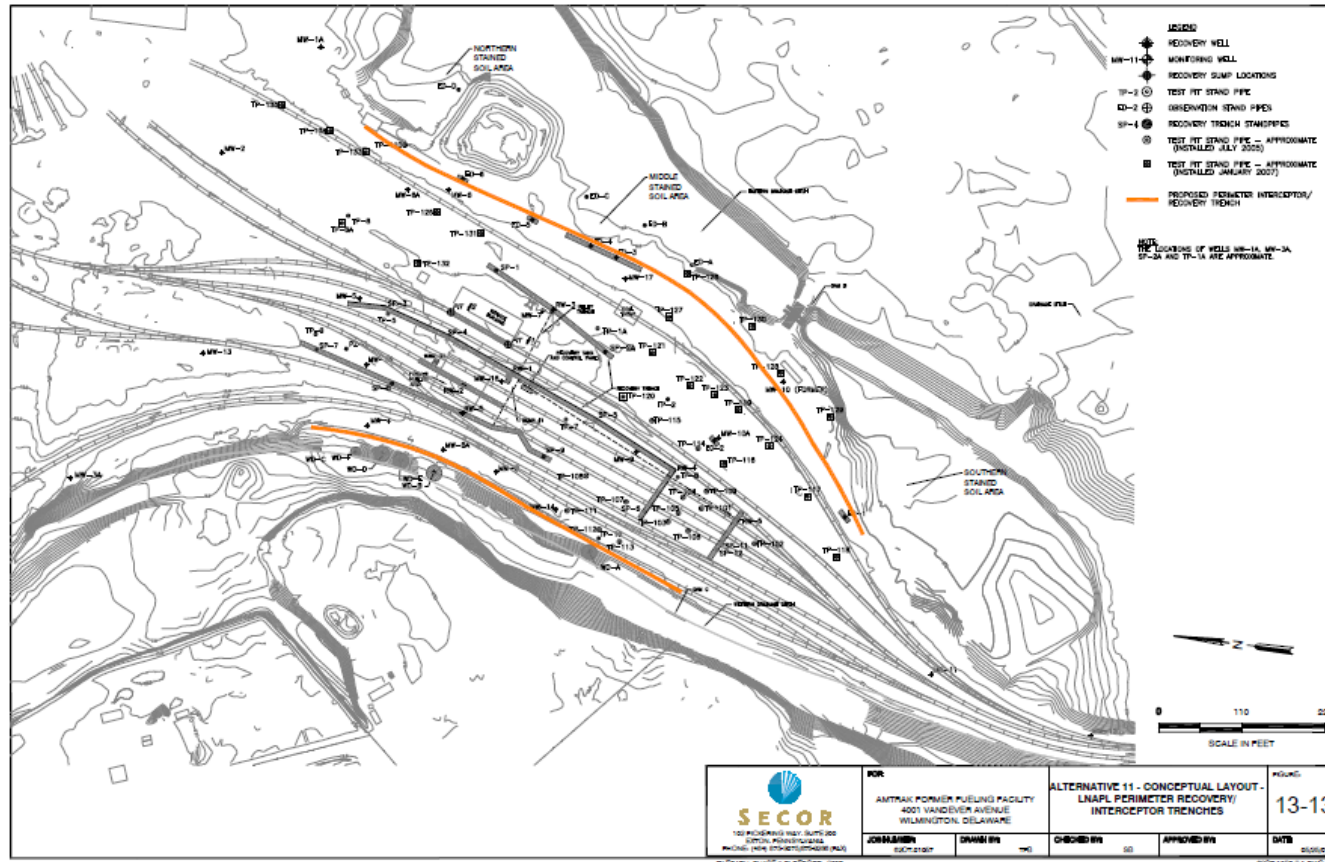
Expectation: Removal and off-site disposal of upland soil with PCB concentrations above 10 ppm. Cap remaining soils with PCBs between 1 and 10 ppm. This cleanup level also applies to the soils east of the EDD

# Site-Wide Soil (cont.)



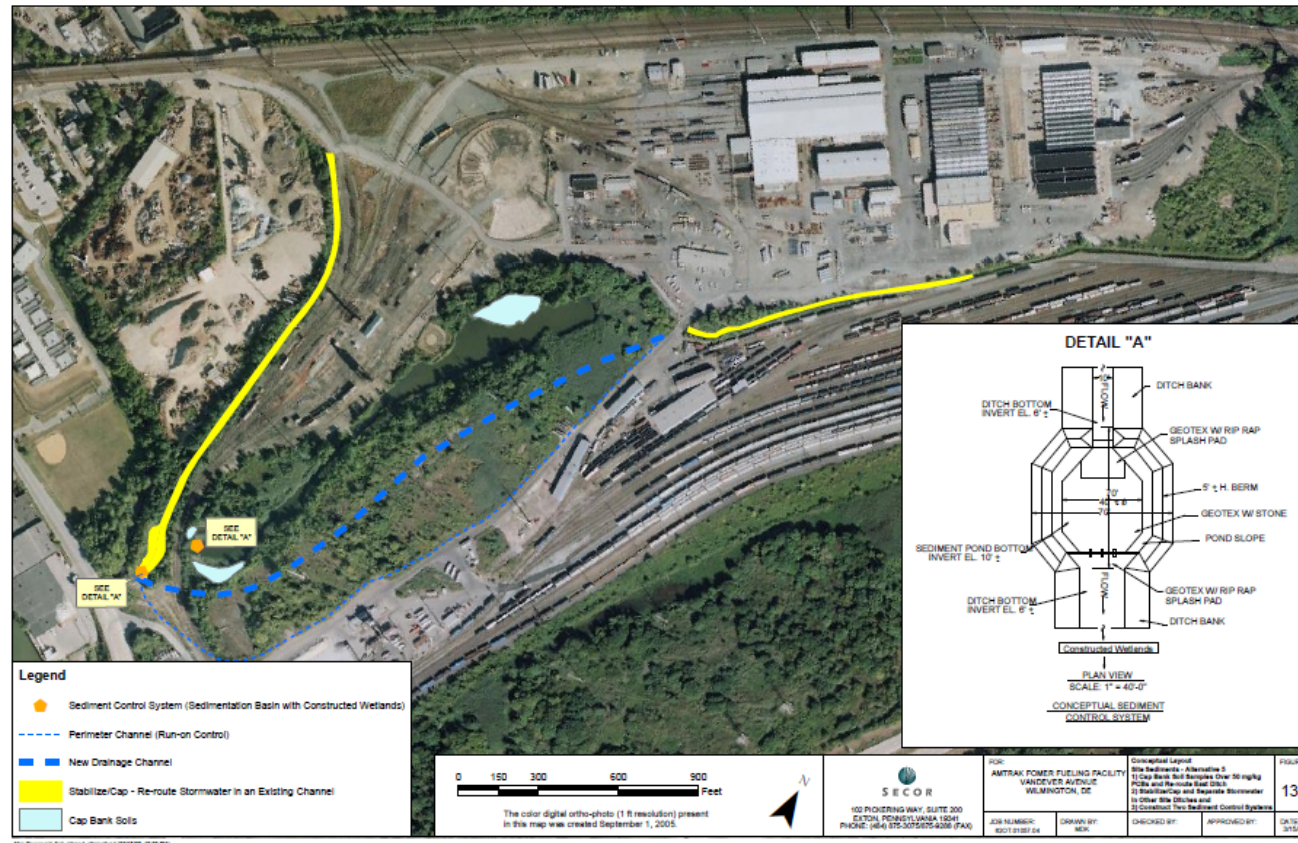


# Control Upland Sources: NAPL/PCB



Expectation: Install the proposed recovery trenches for NAPL/PCB

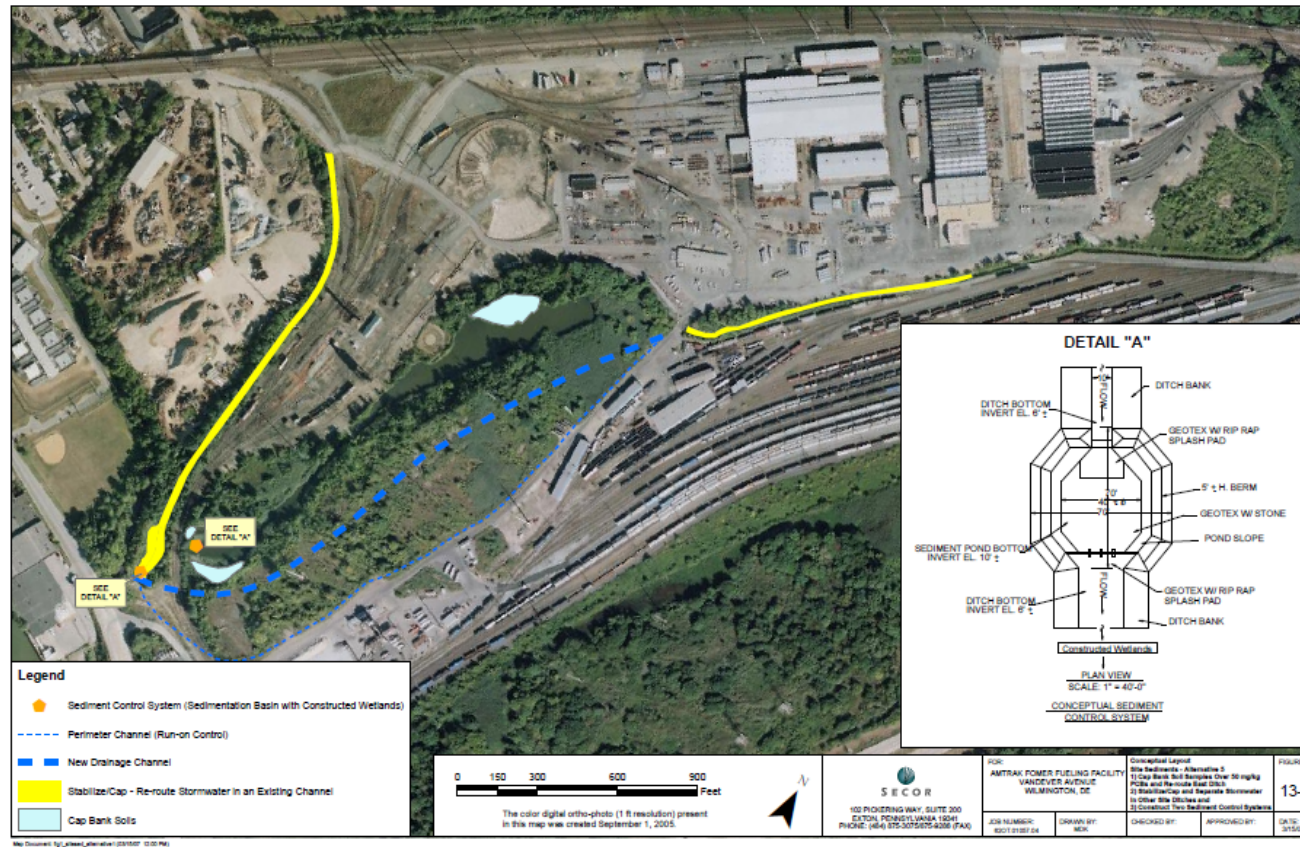
# Remediate EDD Sediments & Bank Soils



Expectation: Removal and off-site disposal of EDD sediments and bank soils with PCB concentrations above 1 ppm. Remediation of remaining bank soils is required to address unacceptable petroleum risk



# Remediate WDD Sediments & Area East of EDD



Expectation: Implement pilot of proposed stabilization and capping for WDD and Ditch East of EDD

# Open Discussion

- Action Items/Sequence:
  - ✓ DNREC will approve portions of the RI/FFS
  - ✓ Amtrak will revise remedial alternatives for EDD and upland soils
  - ✓ Amtrak will submit a hybrid clean up plan for EPA and DNREC approval. This plan will reference the DNREC Assessment and detail how the sediment cleanup standard of 1 ppm will be met.
  - ✓ DNREC will prepare Proposed and Final Plan
- Timeframe